

## REMARKS

The Office Action states that claim 1-7, 14-27, and 33-36 are pending. Please note this is incorrect, as claims 16 and 18 were previously cancelled. Claims 1-7, 14, 15, 17, 19-27, 31, and 33-36 are pending.

Claims 1 and 23 are amended to make it clear that the phone call from the user to the customer service agent is made independent of the website (*i.e.*, it is not made by clicking on an icon/link on the website). This limitation has been in the main body of independent claim 19 since the filing of the first Amendment and Response to Office Action on March 27, 2007. Therefore, Applicant respectfully submits that the amendment to claims 1 and 23 do not give rise to a new prior art search and should not be the basis for a future final rejection in an Office Action.

Claims 1-7, 14, 15, 17, 19-27, 31, and 33-36 are rejected under 35 U.S.C. 102(b) as being anticipated by Greenberg et al. (US 2001/0038624) (hereinafter "Greenberg"). This rejection is respectfully traversed.

Independent claim 1 recites:

A method for correlating a user's use of a website with a user's phone call to a customer service agent for a business, where the phone call to the customer service agent is made independent of the website, the method comprising:

for each user that accesses the website, *transmitting a webpage to the user that visibly displays a unique ID, where the unique ID is unique to the user's web browser, and the where the unique ID is generated without obtaining information that identifies the user personally;*  
storing a record of the unique IDs that have been displayed to users in a webpage;

in response to a user telephoning a customer service agent for the business

independent of the website, obtaining the user's unique ID from the user; and  
*correlating the user's call to the customer service agent with the users' use of the website using the user's unique ID.* (Emphasis added).

The present invention enables a user's use of a website to be correlated with a user's subsequent, non-web initiated telephone call to a customer service agent. Such correlation is useful in tracking the effect of advertising efforts. For example, if a company pays for a link to its website on a search engine site, such as Google or Yahoo, it is desirable for the company to know the percentage of its customers that used that link to subsequently purchase a product. Such information is relatively easy to track if the customer purchases a product on a company's website after using an advertised link. Such information also is easy to track if the user purchases a product in a phone call made by clicking on a link, button, or other icon on the website. However, prior to the present invention, such information was lost if, after viewing the website, the customer elected to purchase the product through a non-web initiated telephone call. The invention also is useful in helping customer service agents answering customer phone calls to cross-sell products in that the customer service agent can see what products the user viewed on the website.

Greenberg is related to a different technology than the present invention. Greenberg is related to voice-over-IP (VOIP) technology. Specifically, Greenberg enables a phone call to be placed from a personal computer without the need for the computer to have been previously configured for Internet telephony (Paragraph 0011).

In the rejection of claim 1, the Examiner focuses on the method described with respect to Figures 10 and 11. The purpose of this method is to enable a user to make an Internet telephony call by clicking on an “icon” on a website. *This method involves a web-initiated call, and, therefore it is not relevant to the present invention.* The purpose of the present invention is to correlate a non-web initiated call<sup>1</sup> (e.g., a traditional phone call) with use of a website. As stated above, it is easy to correlate a phone call with use of a website when a user initiates the call through the website by clicking on a link or button. The difficult problem is associating use of a website with a subsequent, non-web initiated call, and this is the problem that the claimed invention solves.

Moreover, the Examiner appears to equate the “icon” that a user can click on to make a web-initiated call with the unique ID that displayed to the user in the claimed invention. Greenberg states that the icon preferably includes an application server address, a merchant ID, a link ID, and customer/session ID. (Paragraph 0060).

However, such IDs are *not* displayed to a user.

Greenberg defines an “icon” as any object, such as a graphical object or a link, on a webpage that may be clicked on by an end user. (Paragraph 0060) Links and graphical objects that can be clicked on are well known in the art. It is common to associate information, such as IDs with links, buttons, and other clickable objects, but such information is not displayed to the user. If the icon is a link, such information is embedded in the URL. If the icon is a button, then the identification information is in the *hidden* form fields associated with the button. This is supported by the fact that Greenberg refers to the as IDs as “icon identification form fields.” (Paragraph 0062).

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<sup>1</sup> For avoidance of doubt, a user can retrieve a phone number from a website and still make a call that is independent of the website (*i.e.*, not made through the website).

Since the Greenberg method does not involve displaying a unique ID to the user, Greenberg does not disclose any of the steps related to the unique ID recited in claim 1.

The Examiner cites Paragraph 0062 as disclosing that the phone call can be made independent of the website. However, this is not what Greenberg discloses in Paragraph 00062. Instead, in such paragraph, Greenberg discloses that not all icon identification form fields need be used in all applications. As an example, Greenberg notes that if all calls are directed to the same location regardless of which icon the user clicked, the website developer could leave the link ID field blank when he develops the code for the website, as it is not necessary to differentiate from different icons in routing a user's call.

Dependent claims 2-7, 14, 15, 17, are 33-34 recite additional elements that further distinguish the invention. However, a discussion of the individual elements is not necessary, as these claims are patentably distinguishable over Greenberg at least the same reasons as claim 1.

Claims 19-22 and 35-36 include the limitations "for each user that accesses the website, transmitting a webpage to the user that visibly displays a unique ID, where the unique ID is unique to the user's web browser and where the unique ID is generated without obtaining information that identifies the user personally" and "correlating such user's call to the customer service agent with user use of the website by correlating records from each of the website and customer service agent call center using the unique IDs." For the same reasons as described with respect to claim 1, Greenberg does not disclose these limitations.

Claims 23-27 and 31 include the limitations "a web server for the website that transmits a web page that visibly displays a unique ID to each user that accesses the

website, where, for each user, the unique ID is unique to the user's web browser, and unique ID is generated without obtaining information that identifies the user personally" and "an analyzer that correlates users' calls to a customer service agent, made independent of the website, with users' use of the website by correlating records in the first and second databases associated with matching unique IDs." For the same reasons discussed with respect to claim 1, Greenberg does not disclose these limitations.

In view of the above, Applicant respectfully submits that claims 1-7, 14, 15, 17, 19-27, 31, and 33-36 are patentably distinguishable over Greenberg. Applicant respectfully requests allowance of the application.

Respectfully submitted,

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